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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of the)

Implementation of the Pay Telephone)
Reclassification and Compensation Provisions)
of the Telecommunications Act of 1996)

CC Docket No. 96-128

The Bell Atlantic Telephone Companies)
Offer of Comparably Efficient Interconnection)
to Payphone Service Providers)

ERRATUM TO REPLY COMMENTS OF BELL ATLANTIC¹

On February 24, 1997 Bell Atlantic filed Reply Comments in the above-referenced proceeding. Due to administrative error, there were several typographical errors and the table of contents reflected incorrect headings and page numbers. Bell Atlantic hereby corrects these errors and attaches the corrected copy of this filing. There were no substantive changes to the text nor were there changes to either of the attachments in the initial filing. Therefore, the attachments are not included with this filing. Bell Atlantic respectfully requests that the Commission substitute this version of the Reply Comments with the version filed yesterday.

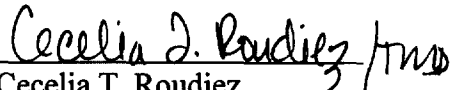
¹ The Bell Atlantic telephone companies are Bell Atlantic - Delaware, Inc.; Bell Atlantic - Maryland, Inc.; Bell Atlantic - New Jersey, Inc.; Bell Atlantic - Pennsylvania, Inc.; Bell Atlantic - Virginia, Inc.; Bell Atlantic - Washington, D.C., Inc.; and Bell Atlantic - West Virginia, Inc., hereinafter collectively "Bell Atlantic."

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Respectfully Submitted,

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February 25, 1997

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REPLY COMMENTS OF BELL ATLANTIC¹

I. Introduction and Summary

Bell Atlantic's CEI Plan² fully explains how Bell Atlantic will comply with the Commission's equal access parameters for its deregulated payphone services and satisfies all of the requirements for a CEI Plan. No deficiency or inaccuracy in Bell Atlantic's CEI Plan has been demonstrated by any of the commenting parties.³ Nor has any party shown any failure by

¹ The Bell Atlantic telephone companies are Bell Atlantic - Delaware, Inc.; Bell Atlantic - Maryland, Inc.; Bell Atlantic - New Jersey, Inc.; Bell Atlantic - Pennsylvania, Inc.; Bell Atlantic - Virginia, Inc.; Bell Atlantic - Washington, D.C., Inc.; and Bell Atlantic - West Virginia, Inc., hereinafter collectively "Bell Atlantic."

² *Bell Atlantic Plan to Offer Comparably Efficient Interconnection to Payphone Service Providers*, CC Docket No 96-128 (filed January 6, 1997) ("CEI Plan").

³ The parties who filed comments are four interexchange carriers (AT&T Corp., MCI Telecommunications Corporation, Oncor Communications, Inc., and Telco Communications Group, Inc., collectively "the IXCs") and five payphone provider trade groups (American Public Communications Council (APCC); Inmate Calling Service Providers Coalition (ICSPC);

Bell Atlantic to comply with the Commission's Payphone Orders.⁴ The Commission should, therefore, promptly approve Bell Atlantic's Payphone CEI Plan.

II. BELL ATLANTIC HAS COMPLIED WITH THE COMMISSION'S REQUIREMENTS IN UNBUNDLING AND TARIFFING ITS BASIC PAYPHONE SERVICES

A. The Tariffed Network Controlled Lines are Identical to the Basic Services That Bell Atlantic Uses In Providing Its Payphone Services.

APCC alleges that Bell Atlantic's unbundling and offer of basic payphone services under state tariff is not adequate⁵. APCC does not dispute that the basic network controlled lines ("NCL") that Bell Atlantic has unbundled from its payphone services and tariffed provide all the basic line and transmission services that Bell Atlantic itself uses in providing its payphone services. APCC argues, however, that "a LEC does not comply with CEI requirements simply because it offers to IPP providers [Independent Payphone Providers] the same tariffed services that the LEC uses."⁶ But, parity of underlying services is exactly what both the CEI requirements and the Payphone Orders prescribe. The Commission has instructed that a BOC must tariff, so that the competitors may use, "the basic services and basic service functions that underlie *its* provision of payphone service."⁷

Central Atlantic Payphone Association (CAPA); New Jersey Payphone Association (NJPA), and Atlantic Payphone Association (APA), collectively referred to as "the Payphone Associations." CAPA, NJPA and APA ("the CAPA Group") filed Joint Comments and Objections."

⁴ *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, Report and Order, FCC 96-388, released September 20, 1996 (hereinafter "Payphone Order"); Order on Reconsideration, FCC 96-439, released November 8, 1996 ("Payphone Reconsideration Order"). The initial Payphone Order and Payphone Reconsideration Order are jointly referred to herein as "Payphone Orders."

⁵ *APCC Comments* at p. 3.

⁶ *Id.*

⁷ *Payphone Order* at ¶ 204 (emphasis added).

B. Bell Atlantic is Not Required to File Federal Tariffs for Its Basic Service

Contrary to the claims of the Payphone Associations,⁸ Bell Atlantic is not required to file federal tariffs for its basic services. The Commission ruled that “LECs must provide tariffed, nondiscriminatory basic payphone services permitting use of “smart” (instrument implemented) payphones and “dumb” (network controlled) payphones, and directed that “LECs must file those tariffs **with the states.**”⁹ The Commission emphasized that “LECs are not required to file tariffs for the basic payphone line for smart and dumb payphones with the Commission, finding that they would “**rely on the states** to ensure that the basic payphone line is tariffed by LECs in accordance with the requirements of Sections 276” of the 1996 Act.¹⁰

No party contests that Bell Atlantic’s intrastate tariffs provide these services and are on file in each state. Basic services for use with smart payphones (Station Controlled Lines or “SCL”) have been available for several years, and tariffs for NCLs for use with dumb payphones have recently been filed. The Payphone Associations contend, however, that the coin control functionality should be stripped from the NCL to create a distinct unbundled service under federal tariff.¹¹ There is no such requirement. The coin control functionality provides the network control of call timing, coin deposit, and return that allow a dumb payphone to interconnect with the network and operate effectively. Network coin control is, therefore, an integral part of the state tariffed NCL. The Payphone Associations are, in effect, asking the Commission to require an optional Basic Service Element (“BSE”) be federally tariffed in

⁸ *APCC comments* at p. 5; *CAPA comments* at p. 11.

⁹ *Reconsideration Order* at ¶ 162 (emphasis added).

¹⁰ *Id.* at ¶ 163 (emphasis added).

¹¹ *CAPA Comments* at p. 27; *APCC Comments* at p. 6.

connection with a state tariffed underlying Basic Serving Arrangement. The Commission has long rejected this “mix and match” approach.¹²

C. Bell Atlantic Is Not Required to Develop Customized Coin Rating or Other Separate and Additional Features.

Bell Atlantic is also not required to disassemble the NCL line and provide separate coin control, call rating and timing, or other specialized functionalities under state tariff as urged by the Payphone Associations.¹³ In its Reconsideration Order, the Commission found that initial unbundling beyond “the basic transmission services” would not be required noting that “some features require substantial costs to make switch changes” and that further unbundling requests would be subject to the specific criteria established in the Computer III and ONA proceedings.¹⁴ Moreover, in the rulemaking process, NJPA specifically asked the Commission to require “access to call rating capabilities” but the Commission did not grant this request in its Orders.¹⁵

The Payphone Associations have again asserted that a separate call rating feature should be offered on NCLs to permit a Payphone Service Provider (PSP) to establish its own charges for local, toll and directory assistance calls.¹⁶ Rating for local coin calls originating from dumb payphones can be and has been set by Bell Atlantic in the payphone instrument. The capability to rate local coin calls is, therefore, properly a customer premises equipment

¹² *Amendments of Part 69 of the Commission’s Rules Relating to the Creation of Access Charge Subelements for Open Network Report and Order and Order on Further Reconsideration and Supplemental Notice of Proposed Rulemaking*, 6 FCC Rcd 4524 at ¶ 65 (1991).

¹³ The CAPA Group argues that the NCL should be re-engineered to permit the simultaneous use of line side answer supervision (“LSAS”) even though it acknowledges that LSAS is technically incompatible with network coin control and is not usable with dumb payphones. (CAPA Comments, p. 26) LSAS is designed and already offered to IPPs for use with SCL lines and smart payphones.

¹⁴ *Reconsideration Order* at ¶ 148.

¹⁵ *Payphone Order* at ¶ 155.

¹⁶ *APCC comments* at p. 12; *CAPA comments* at p.13.

("CPE"), rather than network, function. The switch capability to apply different rates for directory assistance and toll calls on a line-by-line basis, however, is not available today. Unlike smart payphones which can be programmed to perform such rating, dumb payphones necessarily depend on access to an operator services switch that can perform the rating for coin calls through appropriate signaling.¹⁷

The development of the technical capability to permit thousands of different rate schedules and timing intervals through central office and associated switching controls would be a major undertaking. Although, APCC cites Ameritech's *Profitmaster* to support its claim that this rating capability is currently available,¹⁸ Ameritech itself has indicated that the development of this switch adjunct has been limited and expensive, and therefore undertaken only on a demand basis.¹⁹ In any event, the Payphone Associations even admit that IPPs will likely not use the NCL lines²⁰ and thus, their demand for call rating capability and other NCL features they deem would be more useful is illusory, at best. The Commission should not require Bell Atlantic to undertake investment without a showing of demand.

¹⁷ Unlike a coin toll call from a smart payphone, a coin toll call from a dumb payphone over an NCL line is necessarily a type of operator service call. Like collect and card calls, the operator switch controls are needed to complete the call. Bell Atlantic will continue to provide such coin toll calls under its federal and state operator services tariffs. Given that a PSP may not otherwise be compensated for such calls, Bell Atlantic, as the operator service provider, expects to offer commissions for such calls.

¹⁸ *APCC Comments* at p. iii.

¹⁹ *Ameritech Reply Comments* at pp. 10-11.

²⁰ APCC states that "for many IPP providers it is impractical, at least in the near future, to subscribe to the coin line services that LECs use for their own payphone operations. (APCC Comments, p. 3, n.2) The CAPA Group similarly states that the NCL lines are "useless" to IPPs because IPPs deploy smart payphones which are incompatible with the central office controls inherent in NCL lines. (*CAPA Comments*, p. 27)

Moreover, the Commission's 120-day process for new BSEs is available and should be used by the Payphone Associations if they seek to disassemble the basic lines or create new functionalities for use with the NCL basic lines. The CEI Plan already includes provision for the 120 day request process²¹ and, in the absence of such requests, Bell Atlantic should not be compelled to create new services.

Additionally, Bell Atlantic's SCL tariffs already provide IPPs a full range of service options and features for use with smart payphones. Although the CAPA Group claims that the NCLs are lacking in features that are readily usable with smart payphones²², it does not identify any services that IPPs actually lack for interconnection of their smart payphones through existing SCLs. Bell Atlantic already provides to IPPs line side answer supervision, PIC protection, and screening and blocking options, as more fully described in Sections 5 and 8 of the attached IPP Information Booklet (Attachment B) that is provided to Bell Atlantic's IPP customers.

Indeed, Bell Atlantic has been responsive to IPP customer requests for new services. In New Jersey, Bell Atlantic offered LSAS²³ and Limited InterLATA Dialing, used for calling restriction and fraud control, in response to IPP requests for these service features. To date, however, few IPPs use these services. LSAS is also already available in Pennsylvania. Neither NJPA nor CAPA has requested any additional line features for SCLs since the introduction of these services.

²¹ BA CEI Plan at p. 5.

²² CAPA comments at p. 24-27.

²³ LSAS provides for signaling to and from the line side of a smart payphone to indicate when a party goes on and off-hook. NCL lines do not utilize such signaling. LSAS, if used with NCL, would conflict with the central office controls.

III. THE STATE TARIFFED RATES FOR BASIC SERVICES ARE REASONABLE , AND THE COLLATERAL ATTACK ON THE PENNSYLVANIA AND NEW JERSEY RATES IS NOT JUSTIFIED

The CAPA Group contends that the tariff rates for SCLs in Pennsylvania and New Jersey are too high and should be reduced.²⁴ The Commission should dismiss these objections on both procedural and substantive grounds. First, the Commission has left to the states, in the first instance, the review and approval of both NCLs and SCLs.²⁵ Bell Atlantic has made appropriate filings with all state commissions, including, the New Jersey and Pennsylvania commissions. Any challenges to the newly proposed tariff rates are properly subject to resolution by these commissions.

Second, the CAPA Group's claims that the SCL and NCL rates in Pennsylvania are unreasonable is based on a faulty analysis of tariff rates. In its comparison of NCL and SCL rates, the CAPA Group omits to apply the touch tone rate to the recently filed NCL line rate. With this correction, the monthly rate for the NCL is actually \$14.17 and, therefore, higher than the \$13.17 rate for a comparable SCL line with the screening option added to the SCL rate.²⁶

Bell Atlantic's pending tariffs²⁷ also belie the APCC claim that Bell Atlantic's tariff charges are "less for coin line [NCL] service than for COCOT [SCL] service." In all cases, Bell Atlantic's basic rates for NCLs are higher than the rates for SCL even with the addition of

²⁴ *CAPA Comments*, p. 21.

²⁵ *Payphone Reconsideration Order* at ¶ 163.

²⁶ *CAPA Comments*, p. 18.

²⁷ Bell Atlantic provided illustrative tariffs for two states with its CEI Plan, not just one as claimed by APCC. Bell Atlantic also set forth the citations for all the payphone line tariffs for all of the states in its CEI Plan. All tariffs cited in the CEI Plan have been included with this Reply (Attachment A) to remove any basis for APCC's objection to the number of tariffs filed, but Bell Atlantic objects to the APCC request for additional time to file further comments on the CEI Plan in response to Bell Atlantic's Reply.

optional screening to the latter line rate. Even the CAPA Group acknowledges that “in New Jersey, Bell Atlantic has not priced its payphone services in a manner which appears discriminatory on its face.”²⁸

Nor is a rate difference between two states tantamount to discrimination as CAPA maintains²⁹. Rate differences for comparable services in different states typically reflect regulatory and cost differences and are not unique to payphone line services. Furthermore, the difference between New Jersey and Pennsylvania rates is incorrectly described by CAPA. New Jersey SCL rates are not uniformly higher than Pennsylvania rates. The charge for call screening is higher in Pennsylvania than New Jersey, but many of the dial tone line rates in Pennsylvania are lower. If these rates are combined, the SCL [COCOT] rate in Pennsylvania averages \$16.90 (ranging from \$11.40 to \$22.40 depending on density zone) in comparison to \$18.65 in New Jersey . Therefore, in some instances, the SCL rate in New Jersey is lower than in Pennsylvania.

Nor does CAPA provide any justification for its claim that the local message usage projected by Bell Atlantic for NCL lines is discriminatory. The CAPA Group contends that certain of CAPA’s “urban” members’ usage of local messages is higher than the usage underlying Bell Atlantic’s temporary flat rate for NCL.³⁰ Based on this patently selective sampling, CAPA argues that the tariffed NCL rate is understated and improperly favors Bell Atlantic. This logic fails. All purchasers of NCL, IPP and Bell Atlantic alike, will pay the same

²⁸ *CAPA Comments*, p. 21.

²⁹ *Id.*

³⁰ The local message rates that will apply to both the NCL and SCL will be the same within each state. Initially, however, a flat rate for local message usage will temporarily be applied to NCL lines because the technical capability to measure local usage on NCL lines is not yet available. The interim flat rate in each state was determined based on actual and projected usage from payphones NCL lines.

rates for the same services and that is all the Act and Commission Orders require.

IV. BELL ATLANTIC'S PLAN COMPLIES WITH ALL CEI REQUIREMENTS.

APCC contends that the CEI Plan does not contain sufficient information for evaluation or leaves unclear whether nondiscriminatory practices will be followed³¹. A reading of Bell Atlantic CEI plan will show that it fully addresses all required elements, including the fulfillment of equal access, CPNI and nondiscrimination obligations.³² The following sections demonstrate that Bell Atlantic will adhere to nondiscriminatory practices in providing and administering basic services and network interconnection.

A. Service Ordering, Installation and Repair.

The CEI Plan provides that service ordering, installation and maintenance, and service intervals will be provided to nonaffiliated and affiliated PSPs alike on a nondiscriminatory basis.³³ Bell Atlantic's IPP Information Booklet³⁴ also contains detailed descriptions of how IPPs' orders for provisioning and repair of network services will be handled and the expected service intervals. The booklet contains the procedures and policies that apply to establishment of the rate demarcation point (RDP) at payphone premises, service descriptions and rates, and regulatory information.

³¹ APCC Comments, p. 1.

³² APCC Comments, p. 26 .

³³ CEI Plan, p. 7.

³⁴ See Attachment B. Bell Atlantic is currently updating the booklet to include its newly tariffed services as well other relevant information in light of the Commission's Payphone Orders.

Nondiscriminatory technical support for the installation and maintenance of network services will be provided to both IPPs and Bell Atlantic's PSP.³⁵ The same technicians, monitoring systems and testing systems will be utilized to install, maintain and repair lines regardless of the identity of the PSP. Orders, preferred request dates and repair reports will be processed and scheduled in the order received regardless of the identity of the requester.³⁶

B. Number Assignments

In response to the Payphone Associations' request for clarification, Bell Atlantic confirms its existing policy that line numbers, including 8000 and 9000 block numbers, will continue to be assigned on a nondiscriminatory, first-come, first-served basis regardless of the identity of the requesting PSP.

C. Originating Line Screening (OLS) Codes

Several parties have asked the Commission to require Bell Atlantic and other LECs to send a discrete code uniquely identifying calls from lines that are connected to payphones. because the 07 currently transmitted on SCLs signifies only a "restricted line" status and is not unique to SCL lines serving smart payphones.³⁷ As required by the Payphone Orders, Bell Atlantic will transmit 27 (NCL) and 07 (SCL) line screening codes based solely on the type of line used by a PSP. The 27 code will not be reserved for Bell Atlantic use and will apply equally to NCL lines used by PSPs.

³⁵ Only those personnel processing or completing IPP services orders will have access to IPP accounts. As indicated in the CEI plan (p. 10), Bell Atlantic maintains password restrictions so that other marketing personnel will not have access to this information.

³⁶ IPPs will still be able to request that no repair personnel be dispatched in response to trouble reports from premise owners, callers or others unless the IPP authorizes such dispatch through use of a code word or direct confirmation.

³⁷ *AT&T Comments* at p. 7, *MCI Comments* at p. 3 and *APCC Comments* at p. 21.

Bell Atlantic has also tariffed FLEX ANI pursuant to the Commission's latest OLS order.³⁸ Bell Atlantic will transmit a "70" code uniquely identifying SCL (station controlled lines) serving payphones as well as a special code for inmate payphones (29) to carriers subscribing to FLEX ANI. In reply to MCI's inquiry, Bell Atlantic confirms that Bell Atlantic has instituted equal access in all of its end offices and that Feature Group D service is universally available so that neither MCI nor any other carrier will be restricted to Feature Group B lines which can not transmit originating numbers or screening codes.

Additionally, Bell Atlantic will provide quarterly "COCOT" lists of all payphones lines in service as well as monthly bill notations indicating that a line is used for a payphone. These will aid MCI and other carriers in verifying which of the calls from line numbers that transmitted the 07 code were from payphones and are eligible for per call compensation.

D. RDP Policy

APCC contends that the CEI Plan does not make clear whether Bell Atlantic will apply a nondiscriminatory RDP (rate demarcation point) policy. The RDP policies described in the attached IPP Booklet, including Minimum Point of Entry rules, will apply equally to IPPs and Bell Atlantic's already installed PSP payphones, except as provided in the Payphone Orders for existing grandfathered payphones. When network repair services are performed for Bell Atlantic's dumb payphones, a "virtual" Network Interface (NID) will be used to denote the RDP and to track the attendant cost separation and accounting of regulated and deregulated premises wiring work.

³⁸ Bell Atlantic Tariff FCC No. 1, Sections 6.4.1 and 13.3.9; *OLS Policies and Rules Concerning Operator Services Access and Pay Telephone Compensation, petitions pertaining to Originating Line Screening Services*, CC Docket No. 91-35, CCB/CPD File Nos. 96-18, 96-25, and 96-32, Memorandum Opinion and Order, DA 96-2169 (rel. December, 20, 1996).

E. Inmate Services and Semi-Public Services

The CEI Plan applies equally to all payphone services, including public, inmate and semi-public services. ICSPC erroneously asserts that the CEI fails to address inmate services. The CEI Plan defines payphone services as including inmate payphones and specifically identifies the network services (inmate control lines) that are available to PSPs who place payphones at correctional facilities.³⁹ ICSPC also depicts inmate services as more complex and complicated than other payphone services. In Bell Atlantic's case, they are not. Payphones permitting only automated collect calls through an operator service provider and in some cases, limited coin calls, are placed at prisons and other correctional facilities for inmate use. Equipment used for inmate call restriction, PIN identification, and related security controls are dedicated to specific correctional facilities and has been classified as deregulated premises equipment.

In answer to APCC's query concerning whether usage on semi-public lines will be provided to IPPs, Bell Atlantic confirms that usage on the payphone service lines serving semi-public payphones will be available to the PSP purchasing the underlying access line on the same basis such information is available for NCLs and SCLs generally. The tariffed costs for the network services and other expenses in providing Bell Atlantic's semi-public service will be imputed as part of the costs for providing deregulated payphone services.

APCC erroneously contends that a special notification to current semi-public customers is mandated. Bell Atlantic does, however, intend to inform customers of the deregulation and detariffing of their existing service. A letter will be sent in the same fashion that a letter was sent

³⁹ CEI Plan at pp. 3, 5.

to correctional facilities last July in accordance with the Commission's Inmate Order.⁴⁰ Semi-public service is offered on a month-to-month basis and customers, as in the past, are free today to terminate their service.

Upon deregulation, information concerning Bell Atlantic's semi-public service customers will still be proprietary customer account information. The Commission should reject APCC's proposal that Bell Atlantic's PSP should block its own access to its own semi-public customers' information. Bell Atlantic does not plan to peremptorily terminate these customers' existing semi-public service. No statutory provision or Commission rule prohibits Bell Atlantic from using its own CPNI to market and supply an existing service just because the service has been deregulated.

V. NONE OF THE OTHER OBJECTIONS TO BELL ATLANTIC'S CEI PLAN HAS ANY VALIDITY OR RELEVANCE

A. The Duty to Provide IntraLATA Dialing Parity Will Apply to Payphone Lines at the Same Time as Other Lines

Contrary to the claims of APCC and MCI,⁴¹ intraLATA dialing parity for access to other operator service providers does not immediately apply to payphone lines. The Commission ruled that dialing parity for payphone lines must be provided at the same time, not before, such parity is offered generally, and expressly declined to accelerate dialing parity for payphones in advance of other business and residence phones.⁴²

⁴⁰ *Petition for Declaratory Ruling by the Inmate Calling Services*, Declaratory Ruling (RM - 8181) 11 FCC Rcd 7362 (1996), at ¶ 35.

⁴¹ *MCI Comments* at p. 3; *APCC Comments* at p. 15.

⁴² Payphone Order, ¶ 292, "[T]he technical and timing requirements established pursuant to Section 251(b)(3) and Section 271(c)(2)(B), should apply equally to payphones. We find that the burden on the LECs in requiring them to provide dialing parity for payphones, prior to all other phones, outweighs any competitive benefit that might result. In this respect, we note that

As indicated in Bell Atlantic's IPP Information Booklet,⁴³ an IPP can today select and control its "PIC" of a presubscribed IXC for its payphone lines. In response to AT&T's inquiry,⁴⁴ the same process will be available to both Bell Atlantic and any other provider for the payphone lines that each uses as a PSP to provide payphone services. When dialing parity under Section 251(b)(3) of the Act is implemented, all PSPs will be able to use similar processes to choose a presubscribed carrier for intraLATA calls.

B. Bell Atlantic Operator Services Will Bear Its Own Losses for Fraud and Uncollectibles in the Same Manner It Assumes that Risk for Calls from IPP Payphones Today.

Operator Services provided by Bell Atlantic will continue to be subject to the same federal and state regulations that apply today. In specific reply to ICSPC and APCC,⁴⁵ Bell Atlantic does not presently plan to "resell" operator services as a deregulated service either for its inmate services or its payphone services generally. Collect calls from inmate facilities or other locations as well as calling card and other alternately billed calls will continue to be offerings of Bell Atlantic's operator services. Therefore, the risk and responsibility for performing billing validation through LIDB as well as the billing and collection for these calls, including attendant fraud losses and uncollectibles, will remain with the operator service provider, as it is today. The charges for operator service calls are directly billed and received by Bell Atlantic's operator services regardless of whether the payphone is an IPP or Bell Atlantic payphone.

independent payphone service providers' 'smart payphones' can adequately create dialing parity within the payphone unit pending the implementation of true dialing parity."

⁴³ Attachment B, Section 8.

⁴⁴ AT&T Comments at p.3.

⁴⁵ ICSPC Comments at p.11; APCC Comments at p. 22.

Bell Atlantic's operator services will continue to serve IPP and Bell Atlantic payphones equally. Bell Atlantic, as a carrier and operator service provider, will also bear the same responsibility as other carriers to provide appropriate per call compensation for calls originating from IPP payphones. Bell Atlantic already offers negotiated commission payments to IPPs who elect to use Bell Atlantic operator services and anticipates continuing such commission arrangements with both its own PSP and nonaffiliated PSPs.


VI. CONCLUSION

Accordingly, the comments raise no valid arguments for delaying or rejecting Bell Atlantic's CEI Plan.

Respectfully submitted

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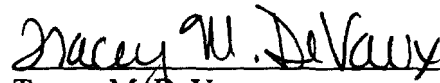
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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of February, 1997 a copy of the foregoing "Erratum to Reply Comments of Bell Atlantic" was sent by first class mail, postage prepaid, to the parties on the attached list.


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